



Darren Hicks
Environmental Analyst
Canada-Newfoundland and Labrador Offshore Petroleum Board
140 Water St., 4th Floor
St. John's, NL A1C 6H6

March 25, 2019

Re: Environmental Assessment Revised Addendum of Multiklient Invest Labrador Offshore Seismic Program, 2018–2023, March 2019

Dear Mr. Hicks,

Please find below our comments with respect to the Environmental Assessment Revised Addendum of Multiklient Invest Labrador Offshore Seismic Program 2018–2023, submitted for review to the Nunatsiavut Government by the C-NLOPB on March 8, 2019.

The Nunatsiavut Government (NG) appreciates the opportunity to comment on the Revised Addendum. In concurrence with the C-NLOPB, the NG remains concerned that the practices surrounding cumulative environmental assessment are not robust enough to neither predict nor assess significant impacts over the span of the project. This is echoed in the C-NLOPB's comments that "a more robust assessment of possible cumulative effects is required."

The comments below correspond to the NG comments and responses from the proponent from the March 2019 document. In this case, the page numbers in the Revised Assessment are referenced.

Comment 1: On page 7, the proponent references an assessment of shipping traffic levels from the Labrador Shelf SEA. As this document was created in 2008 and is stated to cover only up to 10 years from its publication, it would be beneficial to reassess the impact of shipping traffic from more recent shipping data, especially if this project is expected to extend to 2023. This is an example of the need for a more 'robust' assessment.

Comment 2: The NG remains concerned regarding the effectiveness of the EA Updates to provide adequate cumulative effects assessment. As stated on page 8, the proponent proposes to update the "representative cumulative effects assessment in its annual EA Updates when the details of seismic surveying (number of surveys, location, and timing) in a given year will be known." The regulator of this project, the C-NLOPB should:

1. Provide further details on the requirements for a more robust cumulative effects assessment.
2. Provide details on how the CEA should be completed and adjusted within the EA Updates. For example, the EA Update should include not just the annual details of seismic exploration are known for the given year, but should include the projects that have become known or possible for the duration of the entire 6 year project.

25 Ikajuktauvik Road, PO Box 70, Nain, NL, Canada A0P 1L0 Toll Free: 1.866.922.2942 Fax: 709.922.2931

3. Ensure that the proposed monitoring program will be effective in assessing the success of mitigations of the seismic program as well as any cumulative effects.

Thank you for the opportunity to comment on the Revised EA Addendum. Once again we hope that these comments are helpful to the proponent and the C-NLOPB as we move towards an oil and gas regime in offshore Labrador that is based on best practices and iterative learning.

Sincerely,

Claude Sheppard
Director of Non Renewable Resources
Nunatsiavut Government